



Rocky Flats Environmental Technology Site
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July 17, 1995

95-RM-KH-ER-RF-05734

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TRANSMITTAL OF THE PUBLIC HEARING TRANSCRIPT AND DRAFT RESPONSIVENESS SUMMARY TO PUBLIC COMMENTS FOR THE PROPOSED PLAN AND DRAFT MODIFICATION OF THE COLORADO HAZARDOUS WASTE PERMIT FOR THE ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE OPERABLE UNIT 15 INSIDE BUILDING CLOSURES - AMP-012-95

Action Submit Transcript and Draft Responsiveness Summary document to the Department of Energy/Rocky Flats Field Office (DOE/RFFO), United States Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) for review

Enclosed please find a copy of the Public Hearing transcript for the Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit for the Rocky Flats Environmental Technology Site Operable Unit 15 Inside Building Closures (PP/DMP) and the Draft Responsiveness Summary to public comments from the public hearing

Please submit the enclosed documents to the DOE/RFFO, the EPA and CDPHE for their review. A review for classification of the enclosed documents must be conducted prior to transmittal of the documents to DOE/RFFO, EPA, and CDPHE. The enclosed documents are being transmitted in support of the Interagency Agreement (IAG) Milestone of September 29, 1995, for submittal of the Final Corrective Action Decision/Record of Decision (CAD/ROD) for Operable Unit 15 to EPA and CDPHE. In order to meet the IAG Milestone, it is respectfully requested that all written public comments on the PP/DMP which were received by CDPHE and DOE/RFFO be provided to Rocky Mountain Remediation Services, L L C, (RMRS, L L C) on or before July 21, 1995. In addition, EPA and CDPHE comments on the Draft CAD/ROD for Operable Unit 15 should be provided to RMRS, L L C on or before July 21, 1995, in support of the IAG Milestone.

Thank you for your assistance in this matter. If you require additional information, please contact Dennis Schubbe of my staff at extension 8709.

Alan M. Parker
Vice President
ER Projects

WMK bil

Enclosures
As Stated (2)

cc
W M Katz - RMRS
J E Law - RMRS
M J Peters - Kaiser-Hill
N B Sandlin - Kaiser-Hill
D L Schubbe - RMRS

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Responsiveness To Public Comments From June 21, 1995 Public Information Meeting

Proposed Plan/Draft Modification of Colorado Hazardous Waste Permit for the Rocky Flats Plant Operable Unit 15 Inside Buildinglosures

Susan Hurst, Publication Director for Environmental Information Network:

Question 1

I'd like to know exactly where the survey, the swipes, or what you did, were taken to make sure that it's a reasonable way that it was done

Response to Question 1

The sample locations and methodologies are described in the Final Phase I RFI/RI Report Operable Unit 15 Inside Building Closures.

Question 2

And are those (Phase I RFI/RI Report) only available at the reading room, or do you have to order it, or what?

Response to Question 2

The report is available in the Public Reading Rooms. A copy of the report was made available to Ms. Hurst.

Question 3

And I'm wondering if possibly the lead you're getting may be coming from the paint?

Response to Question 3

It is possible that some of the lead detected within samples came from the painted floors. However, lead was detected in the source water (field blank samples). As stated in the Phase I RFI/RI Report, the lead detected in the IHSS samples was attributed to their presence in the source water used for the hot water rinsate sampling.

Question 4

No, my question is, is it (IHSSs) in one little area or is it the whole room?

Response to Question 4

The IHSSs are small areas. In some cases, they're only big enough to hold two 55 gallon drums

Transcript clarification: the original transcript read "255 gallon drums." The sentence should have read two 55 gallon drums

Paula Elofson-Gardine, Executive Director for the Environmental Information Network, and the Chair for the DOE Rocky Flats Technical Review Group:

Comment 1

And overall, in a general sense, I don't really have a problem with your current plan. It seems to be reasonable.

Response to Comment 1

No response necessary.

General Comments

However, there is some concern about the adequacy of the plans for NCPP, with the IHSS as in Building 447, 883, and 865, most particularly with building 447.

Let's say the plans to bring new victims on there, and we want to make sure the people actually have informed consent and have some kind of idea of what they may be exposed to.

Response to General Comments

An IM/IRA has been prepared as part of the National Conversion Pilot Project (NCPP) and was submitted for public comment on December 5, 1994. A Public Hearing for the NCPP IM/IRA was held on January 11, 1995. The NCPP is outside the scope of the *Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit* for OU15. However, as indicated within the PP/DMRP and Phase I RFI/RI Report, the areas within buildings 447, 883, and 885, in which OU15 IHSSs are located, are managed per the RFETS Radiological Control Program in compliance with 10 CFR 835.

1 ROCKY FLATS - DEPARTMENT OF ENERGY
2 PUBLIC INFORMATION MEETING
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11 Denver Marriott West
12 Salon D
13 1717 Denver West Parkway
14 Golden, Colorado
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23 Wednesday, June 21, 1995
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I N D E X

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2 APPEARANCES:

3 Steve Tarlton (CDPHE)

4 Dr. Bill Fitch (DOE)

5 Carl Spreng (CDPHE)

6 Mark Aguilar (EPA)

7 John Wrapp (EG & G)

8 Art Haugh (DOE)

9 PUBLIC SPEAKERS:PAGE

10 Susan Hurst

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11 Paula Elofson-Gardine

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1 P R O C E E D I N G S

2 (Whereupon, the following consists of a partial
3 transcript of the proceedings held, as requested.)

4 MS. HURST: My name is Susan Hurst. I'm the
5 Publication Director for Environmental Information Network.

6 My comments--I had a concern about the way the
7 surveys were done of the room from insider information. I'd
8 like to know exactly where the surveys, the swipes, or
9 whatever you did, were taken to make sure that it's a
10 reasonable way that it was done. Is that possible?

11 DR. FITCH: Should I respond? Do you want me to
12 respond? All right, okay.

13 What you'll find is that the areas surveyed were
14 split into three zones, if you will.

15 MS. HURST: Right.

16 DR. FITCH: There was the IHSS itself, which we had
17 information was where waste was stored or treated. Then
18 there was a perimeter area outside of that, and then we had
19 pathways identified where if we had indications things could
20 have left, how we would have sampled those. Those grids and
21 things are shown in the Phase One report for each IHSS. So
22 there's a breakdown of where every sample was taken.

23 And in the--the thick report there gives you every
24 --I think every non-zero number we took. Is that--Dennis, is
25 that fair?

6

1 MR. SCHUBEL: (inaudible response.)

2 MS. HURST: Great. And are those only available at
3 the reading room, or do you have to order it, or what?

4 DR. FITCH: It's in the reading rooms, and it's
5 available there, and we can make one available to you.
6 Otherwise--

7 MS. HURST: I'd really, really appreciate that.

8 DR. FITCH: Okay.

9 MS. HURST: And then I had a comment about the IHSS
10 areas being utilized for the privatization plan. I think
11 it's a bad idea while we've got storage out there.

12 And I had an additional comment. Oh, about the
13 lead. I would like to make a comment that in the past, they
14 used a lot of the lead-based paint to shield the radiation
15 that was already in the room, and my understanding is there's
16 several layers of this paint. And I'm wondering if possibly
17 the lead you're getting may be coming from the paint?

18 DR. FITCH: No. Let me first--why don't you--could
19 you repeat your comment for me, the one in particular, the
20 first one?

21 MS. HURST: Which part was that?

22 DR. FITCH: Okay. Perhaps--well, in terms of the
23 paint--

24 MS. HURST: Oh.

25 DR. FITCH: --some of the areas have been sealed--

1 MS. HURST: Um-hum.

2 DR. FITCH: --as opposed to painted. We did not
3 find any of the characteristic paints that were used to
4 identify radiation areas in--that are visible, shall we say.

5 MS. HURST: Are you--are you referring to like
6 markers or just wall paint?

7 DR. FITCH: The characteristic DOE way of
8 approaching radiation areas is to paint the area with a
9 certain color paint, and actually, to paint it with two
10 different colors, and so that when one wears off, the other
11 one shows through. I'm not a radiation expert, but that--

12 MS. HURST: No, my question is, is it in one little
13 area or is it the whole room?

14 DR. FITCH: These--these are one little--the areas,
15 the largest one here is eight-by-twelve or maybe twelve-by-
16 twenty, that room that had the grate in front. So those are
17 --these are small areas.

18 MS. HURST: Okay.

19 DR. FITCH: In some cases, they're big enough to
20 hold 255 gallon drums.

21 MS. HURST: Which one?

22 Susan, S-U-S-A-N, Hurst, H-U-R-S-T. You're going
23 to have fun with Paula's name.

24 MS. ELOFSON-GARDINE: My name is Paula Elofson-
25 Gardine, E-L-O-F-S-O-N-G-A-R-D-I-N-E. I'm the Executive

1 Director for the Environmental Information Network, and the
2 Chair for the DOE Rocky Flats Technical Review Group.

3 And we did have opportunity to have presentations
4 on this unit. Thank you. And overall, in a general sense, I
5 don't really have a problem with your current plan. It seems
6 to be reasonable. However, there is some concern about the
7 adequacy of the plans for NCPP, with the IHSS as in Building
8 447, 883 and 865, most particularly with building 447.

9 If you obtain a copy of the 1989 EG & G remote
10 sensing lab aerogamma survey, which is on the bottom of one
11 of our fliers, there are pretty severely high hot areas of
12 building shine from an area around the railroad spur, around
13 the 400 compound, that is hot with manmade gross count and
14 americium photo peaks that really should be taken into
15 consideration as external penetrating gamma radiation that
16 may be something you should be concerned about for people
17 that are being--I don't want to say lure or baited. Let's
18 say the plans to bring new victims on there, and we want to
19 make sure the people actually have informed consent and have
20 some kind of idea of what they may be exposed to.

21 That's all I have for now. Thanks.

22 MR. TARLTON: You can continue to submit written
23 comments on the document to either Carl Spreng at the
24 Colorado Department of Public Health and Environment or Mike
25 Konczal at the Department of Energy. You can see us for the

1 addresses, and that's through July 17th.

2 If there are no other formal comments, we'll
3 terminate the formal comment period and move on with our
4 agenda. Is that okay? Good. Thank you.

5 (Whereupon, the requested portion of the
6 proceedings was concluded.)

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REPORTER'S CERTIFICATE

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2 I, JEANNIE STAKER, do hereby certify that I was
3 present at and recorded the proceedings in the foregoing
4 matter; that I thereafter reduced my recorded tapes to
5 typewritten form, comprising the foregoing transcript;
6 further, that the foregoing transcript is a full and accurate
7 record of the proceedings in this matter on the date set
8 forth.

9 Dated in Denver, Colorado, this 23rd day of
10 June, 1995.

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Jeannie Staker

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